

SPN:BDM:MKM F. #2015R01826

U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

September 5, 2019

By ECF

The Honorable Pamela K. Chen United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Luis Bedoya

Criminal Docket No. 15-569 (PCK)

Dear Judge Chen:

The government writes to respectfully request entry of the enclosed proposed amended preliminary order of forfeiture in the above-referenced case. On November 12, 2015, the defendant pled guilty and consented to entry of a preliminary order of forfeiture, which the Court entered on that same date. See ECF Dkt. No. 11 ("Preliminary Order").

Among other things, the Preliminary Order noted the defendant's consent to the government's immediate seizure of an account held at Bank Hapoalim in Switzerland (the "Forfeited Account") and directed payment of a forfeiture money judgment, in the calculated amount of \$2,742,932.24 (the "Forfeiture Money Judgment"), no later than November 12, 2016. To date, the Forfeited Account has remained restrained pending final forfeiture to the government, to which the defendant has consented, and the sum of \$2,720,572.00 has been paid by the defendant towards the Forfeiture Money Judgment. This leaves an outstanding balance of \$22,360.24 due and owing. The proposed amended preliminary order of forfeiture requires payment of this outstanding balance no later than the date of the defendant's sentencing.

The government has conferred with counsel for the defendant, who has indicated that the defendant has no objection to entry of the proposed amended preliminary order of forfeiture.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: <u>/s/</u>

Samuel P. Nitze M. Kristin Mace Keith D. Edelman Assistant U.S. Attorneys (718) 254-6879

cc: Matthew Myers, Esq., counsel for the defendant.